



5301 Wisconsin Avenue, NW
Suite 800
Washington, DC 20015
T: 202-362-0041
F: 202-362-2640
www.odonoghuelaw.com

January 12, 2026

VIA ELECTRONIC FILING

Honorable Peggy Kuo U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: Trustees of the Plumbers Local Union No. 1 Welfare Fund,
et al. v. Spray in Place Solutions, LLC, et al. 24 CV 2568 (KAM) (PK)*
Joint Status Report to the Court**

Dear Judge Kuo:

This firm represents Plaintiffs in the above-referenced matter. We write in accordance with the Court's Order dated December 15, 2026, directing the parties to file a joint status report by January 12, 2026, reporting on the progress of the settlement discussions, and whether a settlement conference or referral to EDNY Court-Annexed mediation would be fruitful.

Plaintiffs have complied with all Court-ordered deadlines and are seeing to all their discovery obligations. As previously reported by the parties, the final requirement of the stipulation was that Defendants made payment of any undisputed amounts owed to Plaintiffs. As reported in the last joint status report to the Court, Plaintiffs' auditors determined the uncontested amounts owed to the Plaintiffs and provided this information to the Defendants on October 14, 2025. Defendants reviewed Plaintiffs' submission, and on December 11, 2025, agreed that a portion of the submission was undisputed and agreed to pay said amount. Plaintiffs made a demand for the immediate payment of said amount on December 12, 2025. To date, the Plaintiffs have not received any payment.

Further, to date Plaintiffs have not receive the Defendants' settlement offer, which was ordered by the Court to be provided by November 25, 2025. Until Defendants provide any supporting documentation regarding the disputed amounts that could allow the Plaintiffs' auditors to assess whether the findings could be revised, pay any undisputed amounts, and otherwise engage in initial settlement discussions, Plaintiffs submit that a settlement conference or referral to EDNY Court-Annexed mediation would not be fruitful.

Plaintiffs contacted Defendants in an attempt to draft and file a joint status letter to the Court. Defendants indicated that they were unavailable to provide a letter by today, asked for an extension of time, and did not consent to the filing of a proposed joint status report by the time of filing. This status report is therefore being filed only on behalf of Plaintiffs at this time.

Respectfully submitted,

/s/ Rebecca W. Richardson

Rebecca W. Richardson, Esq.

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I, Rebecca W. Richardson, hereby certify that on this January 12, 2026, a true and correct copy of the forgoing Status Report was sent by way of the Court's ECF system and by electronic mail to the following:

Emmanual Kataev, Esq.
SAGE LEGAL LLC
emanuel@safelaw.nyc
Attorneys for Defendants

/s/ Rebecca W. Richardson
Rebecca W. Richardson, Esq.
O'DONOGHUE & O'DONOGHUE LLP
5301 Wisconsin Avenue NW, Suite 800
Washington, D.C. 20015
Phone: (202) 274-2439
richardson@odonoghuelaw.com
Counsel for the Plaintiffs